

MEMO ENDORSED

KAZLOW & KAZLOW
ATTORNEYS AT LAW

NEW YORK OFFICE

237 W. 33rd Street, 14th
New York, NY 10001
Phone: (212) 947-2900
Toll Free: (800) 772-987
Fax: (212) 563-0629

Gene R. Kazlow, Esq.
Stuart L. Sanders, Esq.
Ingrid Golcni, Esq.

www.kazlowandkazlow.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11-18-15

November 10, 2015

VERMONT OFFICE

32 Main Street
Montpelier, VT 05602
Phone: (802) 479-8990
Toll Free: (800) 772-987
Fax: (802) 223-4689

Alan Rome, Esq.**

**Also admitted in
Massachusetts

VIA FAX (212) 805-7949 and E-FILING

Hon. P. Kevin Castel
United States District Court Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 12C
New York, NY 10007-1312

Re: Navana Logistics Limited v. TW Logistics, LLC, et al.
Case No. 15 CV 856 (PKC)

Dear Judge Castel:

As a follow-up to my letter of October 26, 2015 concerning the above-referenced matter, I am writing to request an additional extension of the factories' time in which to file a motion to intervene in the action to December 4, 2015 (the original deadline, i.e. October 29, 2015, was extended to November 13, 2015 by your Endorsement Memo of October 27, 2015 on my letter). As I noted in my prior letter, this case involves approximately thirty shipments by seven different factories. Due to the number of parties involved, and the language and cultural differences that exist between us and our clients, obtaining the information and documents that we need to fully grasp the facts of the case, and to properly assess our client's rights vis-a-vis the different defendants, has been a slow and difficult process. We will therefore need the additional three weeks to complete our investigation and prepare the required papers.

We propose the following revised briefing schedule: December 4, 2015 for the factories to file their motion; December 18, 2015 for the current parties to respond; and December 24, 2015 for the factories to reply.

Very truly yours,

Stuart L. Sanders
Stuart L. Sanders

Application granted in part. Denied in part. "Factories" was moved by November 24, 2015. (FINAL) Parties may respond by December 23, 2015. Reply by June 6, 2016. SO ORDERED.

USOJ
11-18-15

Hon. P. Kevin Castel

November 10, 2015

Page 2

cc: Jeffrey A. Maidenbaum, Esq. (via e-mail)
Rick Aaron Steinberg, Esq. (via e-mail)
Laurie Sayevich Horz, Esq. (via e-mail)
David Hamilton, Esq. (via e-mail)
Leonard L. Flesig, Esq. (via e-mail)
Stuart Martin Steinberg, Esq., (via e-mail)